

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

GABRIELA NIEVES,

Plaintiff,

v.

Case No: 1:20-cv-00320-JMS-DML

CARMEL CLAY SCHOOLS,

Defendant.

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**PARTIES' JOINT SUBMISSION FOLLOWING DECEMBER 4, 2020 DISCOVERY  
CONFERENCE**

Plaintiff, Gabriela Nieves (“Plaintiff”), and Defendant, Carmel Clay School Corporation (“Defendant”), by their respective counsel and pursuant to the Court’s December 4, 2020 Order (Dkt. 80), submit this Joint Report to the Court following the Discovery Conference which took place on December 4, 2020 at 10:00 a.m. before Magistrate Judge Debra McVicker Lynch:

1. The parties presented two issues before the Court at the Discovery Conference on December 4, 2020. (*See Parties’ Joint Submission in Advance of Discovery Conference*, Dkt. 79.)

2. With the guidance from the Court from the Discovery Conference, the parties report that the two issues presented have been resolved to the satisfaction of both parties.

3. No further action is needed from the Court on the two issues formally presented. The parties are still discussing the privilege matters and argument informally presented before the Court on December 4, 2020 and will advise if an additional Discovery Conference is needed in the future on this issue. This matter was not part of the Parties’ Joint Submission in Advance of Discovery Conference and the parties continue to seek a resolution on this matter.

WHEREFORE, the parties, by the undersigned counsel, respectfully submit this Joint Submission following the Discovery Conference that took place on December 4, 2020 at 10:00 a.m. before Magistrate Judge Debra McVicker Lynch.

Respectfully submitted,

/s/ Jonathan Little\*

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*\*Signature affixed with email permission*

/s/ Jessica Williams Schnelker

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 4th day of January, 2021, a true and exact copy of the foregoing was sent electronically to the following counsel of record:

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